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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

VS.

VANESSA RUIZ, an individual

Defendant.

DEFENDANT'S UNOPPOSED
MOTION FOR AN EXTENSION
OF TIME

COMES NOW Defendant by and through his attorney of record, CRAIG W. DRUMMOND, ESQ., in accordance with F.R. Crim. P. 45 and 47, and hereby moves this Honorable Court to extend the period of time for defense counsel to file any Motions for a period of seven (7) days.

This motion is made and based on the enclosed affidavit of counsel, Points and Authorities, all pleadings and papers on file herein and any oral argument requested by the Court at the time of hearing.

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I.

STATEMENT OF FACTS

That the current Scheduling Order in this matter places the Motion due date for January 25, 2013. Trial in this matter is set for April 23, 2013.

That additional time is needed so that current counsel may complete the Defendant's pretrial motions and discuss with the Defendant about this issue, as she is currently confined in Pahrump, NV. As outlined below, on January 25, 2013, counsel spoke with Ms. Kimberly M. Frayn, AUSA, who stated that she did not object to this seven (7) day request and authorized this office to file this Motion as Unopposed.

II.

**AFFIDAVIT AND DECLARATION OF COUNSEL
IN SUPPORT OF MOTION TO CONTINUE**

STATE OF NEVADA)
) ss:
COUNTY OF CLARK)

CRAIG W. DRUMMOND, ESQ, being first duly sworn, deposes and says:

15 1. That I am a duly licensed practicing attorney in the State of Nevada, County of Clark,
16 maintaining an office at Craig W. Drummond, P.C., 228 South Fourth St., First Floor, Las Vegas,
17 Nevada 89101, and am the attorney of record for Defendant in the above entitled matter.

18 2. That upon review of this office's calendar, it appears that the motions deadline in this
19 case was mis-calendared and counsel is in the process of preparing a couple of motions in this case,
20 but have not completed them upon belief that there was some additional time to complete them.
21 Additionally, counsel requests time to review these motions with the Defendant, who is currently in
22 custody in Pahrump, NV.

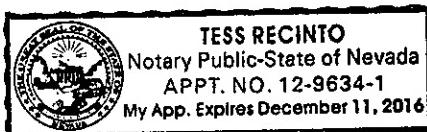
23 6. That on January 25, 2013, this office contacted Ms. Kimberly M. Frayn, AUSA, about
24 this present Motion for Extension of time and she stated that she had no objection to counsel's request
25 for a one week, seven (7) day extension from today for the Defendant to file any pre-trial motions.

7. I sign and declare under penalty of perjury that the above statement is true and correct.

~~CRAIG W. DRUMMOND, ESQ.~~
Nevada Bar No. 011109

SUBSCRIBED AND SWORN TO ME

on 25 January, 2013.



NOTARY PUBLIC

III.

CONCLUSION

WHEREFORE, the Defendant requests this Honorable Court allow an extension of time for the Defendant to file any Motions for a period of seven (7) days.

DATED this 25 of January, 2013.

Respectfully Submitted,

~~CRAIG W. DRUMMOND, ESQ.~~
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Attorney for Defendant

1 **CERTIFICATE OF SERVICE**
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3 I HEREBY CERTIFY that on the 25 day of January, 2013, the undersigned served the
4 foregoing Defendant's Motion for an Extension of Time on all counsel herein by causing a true
5 copy thereof to be filed with the Clerk of Court using the CM/ECF system, which was served via
6 electronic transmission by the Clerk of Court pursuant to local order

7 Employee of CRAIG W. DRUMMOND, P.C.
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18 **IT IS SO ORDERED.**
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22 **UNITED STATES MAGISTRATE JUDGE**
23 **DATED:** 2-14-2013
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